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BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Hill v. Bloomberg L.P., 14-CV-09809 (CM)

Dear Judge McMahon:

This firm represents Defendant Bloomberg L.P. ("Bloomberg") in the above-referenced action. I write to update the Court on events relevant to Bloomberg's pending motion for summary judgment.

On September 21, Bloomberg filed a notice of motion for summary judgment, together with a memorandum of law, Rule 56.1 statement of material facts, and supporting declarations and exhibits (Docket Nos. 18-25). The motion papers were served via ECF on Plaintiff's counsel that same day. Pursuant to Your Honor's individual rules of practice, Plaintiff's answering papers were due on October 5. That date has now passed and Plaintiff has not filed answering papers. Accordingly, Bloomberg respectfully requests that the Court deem all statements in its Rule 56.1 statement of material facts as admitted. *See Pierre v. Archcare, Inc.*, No. 13-cv-7499, 2015 BL 5185, at *3-4 (S.D.N.Y. Jan. 10, 2015) (deeming all facts as admitted in defendant's unopposed Rule 56.1 statement and granting summary judgment in favor of defendant). Bloomberg also respectfully directs the Court's attention to the statement of undisputed facts in the parties' Proposed Joint Pretrial Order submitted to the orders and judgments clerk on September 25, 2015, which adopts the vast majority of statements from the Rule 56.1 statement.

Bloomberg therefore requests that the Court grant the relief sought in its unopposed motion for summary judgment, and such other relief as the Court may deem appropriate.

Respectfully submitted,



Deirdre N. Hykal

cc: Kenneth W. Richardson, Esq. (via email)
Counsel for Plaintiff Gary Hill